

IN THE DISTRICT OF THE UNITED STATES
FOR THE DISTRICT OF SOUTH CAROLINA

GREENVILLE DIVISION

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UNITED STATES OF AMERICA

Plaintiff,

V.

GORDON L HALL

BENTON T HALL

Defendants.

GORDON L HALL

BENTON T HALL

Petitioners,

and

UNITED STATES OF AMERICA

Respondent.

CASE NO. 6:13-cr-00170-JMC

DEFENDANTS/PETITIONERS' RESPONSE

TO GOVERNMENT'S MOTIONS IN LIMINE

(ECF # 135 AND ECF # 136)

The Defendants/Petitioners, GORDON L HALL and BENTON T HALL, by and through the undersigned, conditionally accepts the Government's Motions in *Limine* (ECF # 135 and ECF # 136) upon proof of claim that the Motions in *Limine* are not directed at the presumption of a trial which has been made moot by the private administrative process between the Defendants/Petitioners and the Plaintiff/Respondent which has resolved all matters, purged any contempt by the Defendants/Petitioners, tendered sufficient consideration for the setoff, settlement, and closure of any and all accounts in the matter; and upon proof of claim that the Plaintiff/Respondent has not made the Motions in *Limine*, knowing that the Plaintiff/Respondent

has consented to the settlement and on proof of claim that the acts and actions of the Plaintiff/Respondent do not constitute a violation of implied covenant of good faith and fair dealings and does not make said offer moot and a FRAUD ON THE COURT and upon proof of claim that the Plaintiff/Respondent's acceptance of the Defendants/Petitioners' tender (See ECF # 42) which has satisfied and discharged Plaintiff/Respondent's claims in this instant case does not make the Plaintiff/Respondent's Motions in *Limine* moot.

WHEREFORE PREMISES CONSIDERED, the Defendants/Petitioners moves this Court to have the Plaintiff/Respondent appear and show cause why the filing of the certified record of accord (ECF # 82) that manifests satisfaction and discharge of Plaintiff/Respondent's claim in this instant case should not be enforced and upon proof of claim that Plaintiff/Respondent failing to show cause why the record of accord should not be enforced shall constitute the Plaintiff/Respondent's stipulation and agreement to Entry of Default and a subsequent Entry of Default Judgment in favor of the Defendants/Petitioners and the Defendants/Petitioners further moves:

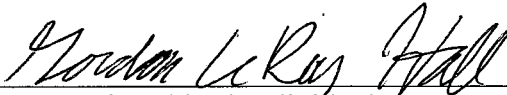
- 1) That the Court enforce the FINAL EXPRESSION OF AGREEMENT IN A RECORD (ECF # 44) issued to the UNITED STATES OF AMERICA, require complete compliance with the FINAL EXPRESSION OF AGREEMENT IN A RECORD, direct the UNITED STATES OF AMERICA to obey the FINAL EXPRESSION OF AGREEMENT IN A RECORD served upon the UNITED STATES OF AMERICA, and order the UNITED STATES OF AMERICA's attendance and testimony and the production of the dismissal of the Defendants/Petitioners, GORDON L HALL and BENTON T HALL, in Civil Case #: 8:12-cv-02078-JMC, Criminal Case #: 6:13-cr-00170-JMC, and including but not limited to all derivative actions derived from said

Civil Case, release all assets seized from the UNITED STATES DEPARTMENT OF JUSTICE FEDERAL BUREAU OF INVESTIGATION other than the assets pursuant to said FINAL EXPRESSION OF AGREEMENT IN A RECORD required by the terms of the Tender (ECF # 42) and FINAL EXPRESSION OF AGREEMENT IN A RECORD before the Defendant/Petitioner, GORDON L HALL, or Gordon LeRoy Hall, Private Unenfranchised Individual, and to release the Defendants/Petitioners, GORDON L HALL and BENTON T HALL, from confinement, at such time as may be fixed by the Court;

- 2) That the Court enter a final judgment and enforcement order; and
- 3) That the Court grant such other and further relief as is just and proper.

Respectfully submitted *nunc pro tunc* to the 13th day of September, 2013.

GORDON L HALL

By: 
Private Unenfranchised Individual

BENTON T HALL

By: 
Private Unenfranchised Individual